

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)

Plaintiff,)

v.)

LUCKY DOG TRUCKING, INC.)
an Illinois corporation not in good standing, and)
JOE SCOTT, Individually)

Defendant.)

No. 07 C 7229

Judge Leinenweber

Magistrate Judge Schenkier

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on December 26, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon LUCKY DOG TRUCKING, INC., an Illinois corporation not in good standing on January 3, 2008 and a copy of the proof of service was filed with the court on January 7, 2008.
3. Service was made upon JOE SCOTT, Individually on January 25, 2008 and a copy of the proof of service was filed with the court on January 31, 2008.

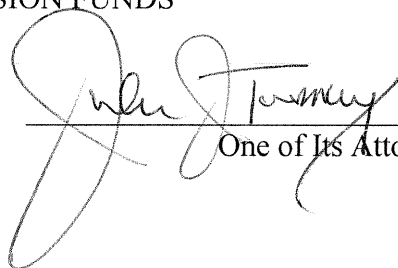
4. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$1,313.81 Pension
\$2,169.14 Welfare
\$925.00 Attorneys fees
\$493.00 Court costs
\$4,900.95

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants, LUCKY DOG TRUCKING,. INC., an Illinois corporation not in good standing and JOE SCOTT, Individually, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$4,900.95.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

By:

 2/22/08
One of Its Attorneys

JOHN J. TOOMEY
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